

U.S. Environmental Protection Agency, Region 9
Guidelines for Asset Protection for
Drinking Water, Source Water Assessment & Wastewater Programs
Under the General Assistance Program (GAP) Program

Tribes may use General Assistance Program (GAP) funds to plan, develop, and “test drive” drinking water, source water assessment and wastewater programs. The “test drive” period can take one to three years to complete. At the end of the “test drive” period, a tribe must have established sustainable drinking water, source water assessment and/or wastewater program(s), with the technical, financial and managerial capacity to properly operate and maintain the program(s) over time.

Funds awarded to individual tribes for these activities have ranged from \$3,000 to \$40,000.

EPA encourages tribal collaborative projects which facilitate asset protection activities, such as tribes sharing a certified operator or working together to develop asset protection programs.

If a tribe requests funding for more than one program (drinking water, source water assessment or wastewater), each program must be in a separate workplan component. Do not combine drinking water, source water assessment and wastewater activities in the same workplan component.

Note: GAP cannot fund drinking water, source water assessment, and wastewater activities on a long term basis, because “program implementation” is not eligible for GAP funding.

Drinking Water Asset Protection

A sustainable, well-run drinking water program includes the following characteristics – ***achieving these characteristics is the primary goal of GAP funding for this program:***

- ***A capable manager or management (e.g., utility board).***
- ***A dedicated budget and funding to support operations & maintenance (O&M).***
- ***The operational skills to conduct proper O&M in compliance with the Safe Drinking Water Act***

Note that most training for managers, operators and water utility boards is available to Region 9 tribes for no cost and therefore not applicable for funding. However – training is an important component of building a sound and sustainable program and should be pursued concurrent with receiving GAP funding for this program. Additionally, since a large part of meeting the above goals involves meeting the multiple and complex requirements of the federal Safe Drinking Water Act (SDWA), proposals and workplans for this program should be coordinated with your Drinking Water (DW) Project Manager (see contact information below).

Key activities you might include in your proposal follow. Note that on-site technical assistance and training for all of the below activities, as well as many off-site classroom training events, are generally no cost and therefore not applicable for funding requests.

Year 1:

1. Conduct initial or overdue SDWA Monitoring (Note that baseline monitoring is established during a 3-year period with the greatest cost burden occurring during the first year) and Reporting for your water system (specific requirements vary for each system and you must consult with your EPA DW Project Manager to determine what you will need for compliance). In general you will be required to address the following contaminant groups, either through monitoring or by receiving a waiver:
 - a. Radionuclides (4 quarters)
 - b. Nitrate, nitrite
 - c. Asbestos
 - d. Inorganics
 - e. Volatile Organics (4 quarters)
 - f. Synthetic Organics (4 quarters)
 - g. Lead and Copper (2 consecutive 6-month sampling events)
 - h. Disinfection By-products (summertime sample collection)

Again, the specific contaminants and monitoring frequencies will be determined through consultation with your EPA DW Project Manager. Monitoring costs should be estimated based on this determination. (Deliverable: monitoring results submitted to EPA DW Project Manager on schedule – DW Project Manager sign-off that task completed and compliance met)

2. Operator Certification (for some this may include hiring an operator) – the classes and tutoring are free, but GAP funds can pay for study materials and exam registration fees. (Check with your EPA DW Project Manager to find out what level of certification your system requires). Note: Certification is only required of operators running systems that employ disinfection. (Deliverables: appropriate documentation of exam registration, study materials receipts, certification numbers once certified and reported to DW Project Manager)
3. Preparation of annual Consumer Confidence Reports due July 1 of each year. (Deliverable: confirmation from DW Project Manager that task completed on time)
4. Work with your EPA DW Project Manager in developing or updating your Coliform Sample Siting Plan and related emergency procedures. (Deliverable: copy of DW Project Manager approved Sample Siting Plan completed by due date)
5. Prepare a Chemical Monitoring Waiver Application for submittal to EPA. (Consult with EPA DW Project Manager during this process, and note that some waivers will require at least one set of baseline data). (Deliverable: confirmation of completed Waiver Application submitted to DW Project Manager by due date)
6. Register for one membership to the American Water Works Association or other professional DW organization that fosters profession development in the field of drinking water. (Deliverable: documentation of membership)

Years 2-3:

1. Conduct any ongoing baseline monitoring (remember that baseline monitoring is established over a 3-year period) and reporting as required after consultation with your EPA Project Manager. (Deliverable: monitoring results submitted to EPA DW Project Manager on schedule – DW Project Manager sign-off that task completed)
2. Develop a long-term monitoring and reporting schedule for maintaining compliance with the SDWA and support annual budget estimates. (Deliverable: DW Project Manager approved Monitoring schedule)
3. Develop the annual Consumer Confidence Report for your system due every July 1. (Deliverable: confirmation from DW Project Manager that task completed on time)
4. Contract to have “as built” drawings for your water system completed, if needed. Consult with your EPA DW Project Manager or other technical assistance provider in procurement process to ensure quality deliverables. (Deliverable: confirmation that “as-built” drawings submitted to DW Project Manager)
5. Develop an operations and maintenance plan specific to your system (seek technical assistance as needed during this process). (Deliverable: statement asserting completion with copy of the table of contents provided)
6. Develop a 5-year operating plan for the managerial and financial operational needs of your system. (Deliverable: statement asserting completion with copy of table of contents provided)
7. Develop policies and/or ordinances relative to good system management and oversight. (Deliverables: copies of signed and dated ordinances or policies)
8. Conduct a rate study and develop a rate structure that will be responsive to meeting system operational costs. (Deliverables: rate study, tribal ordinance implementing rate structure, report of rate collection)
9. Renew annual membership to the American Water Works Association or other professional DW organization that fosters profession development in the field of drinking water. (Deliverable: documentation of membership)

Again, coordination with the EPA DW Project Manager in developing your specific proposal and workplan is essential – the DW Project Manager contact list follows here:

Southern and Central California

Helen McKinley (mckinley.helen@epa.gov, 415-972-3559)

Owens Valley, Northern California, and Nevada

Roger Yates (yates.roger@epa.gov, 415-972-3549)

Western Arizona, Las Vegas & Kaibab-Paiute

Karl Banks (banks.karl@epa.gov), 415-972-3557)

Hopi, Tohono Oodham

Bessie Lee (Lee.bessie@epa.gov, 415-972-3776)

San Carlos, Gila River & Ak-Chin, White Mountain

Danny Collier (collier.danny@epa.gov, 415-972-3565)

Navajo

Brian Smith (smith.brian@epa.gov, 415-972-3580)

Source Water Assessment Asset Protection

A sustainable well-run source water assessment program includes the following characteristics and achieving these characteristics is the primary goal of GAP funding for this program:

- A capable manager or management
- A dedicated budget and funding to support operations and maintenance (O&M)
- The operations skills to implement the source water assessment program in compliance with the Safe Drinking Water Act

Note that source water assessment training may be available through EPA to Region 9 tribes for no cost. Training is an important component of building a sound and sustainable program and should be pursued concurrent with receiving GAP funding for this program. Additionally, since a large part of meeting the above goals involves meeting the multiple and complex requirements of the federal Safe Drinking Water Act (SDWA), proposals and workplans for this program should be coordinated with your Source Water Assessment Project Officer (see contact information below).

Year 1:

Develop a Source Water Assessment Program which may include the following four steps:

- a. Delineating source water areas around the drinking water source;
- b. Identifying potential sources of contamination that may impact the protection area;
- c. Determining the susceptibility of the identified potential sources of contamination to a drinking water source;
- d. Communicating the results to the served community.

(Deliverables: source water assessment delineation report, report of potential sources of contamination, outreach materials)

Years 2-3:

Develop and “test drive” Source Water Protection control measures, such as:

- a. onsite wastewater treatment system management plan
- b. zoning ordinances
- c. public outreach
- d. contingency plan
- e. well abandonment

(Deliverables: On-site wastewater management plan, septic system pump zoning ordinance, outreach materials, contingency plan, list of wells properly abandoned)

Contact: Jamelya Curtis (curtis.jamelya@epa.gov, 415-972-3529)

Wastewater Asset Protection

A sustainable, well-run wastewater program includes the following characteristics and achieving these characteristics is the primary goal of GAP funding for this program:

- a capable manager or management (e.g., utility board)
- a dedicated budget and funding to support operations & maintenance (O&M)
- the operational skills to conduct proper O&M in compliance with the Clean Water Act

Note that most training for managers, operators and water utility boards is available to Region 9 tribes for no cost and therefore not applicable for funding. However – training is an important component of building a sound and sustainable program and should be pursued concurrent with receiving GAP funding for this program. Additionally, workplans for this program should be coordinated with your EPA Water Division contact (see contact information below).

Year 1:

1. Operator Certification (for some this may include hiring an operator) – the classes and tutoring are generally free, but GAP funds can pay for study materials and exam registration fees. (Deliverables: documentation of exam registration, study materials receipts, certification numbers)
2. Conduct initial or overdue water quality monitoring as required by an EPA Clean Water Act National Pollutant Discharge Elimination System (NPDES) permit. Conduct monitoring for facilities without an NPDES permit to determine the effectiveness of treatment processes. (Deliverables: monitoring results submitted to EPA Water Division program contact)

Years 2-3:

1. Conduct ongoing baseline monitoring (remember that baseline monitoring is established over a 3-year period). (Deliverable: confirmation that monitoring results submitted to EPA Water Division program contact)
2. Contract to have “as built” drawings for your water system completed, if needed. Consult with your EPA Water Division program contact or other technical assistance provider in procurement process to ensure quality deliverables. (Deliverable: confirmation that “as-built” drawings submitted to EPA Water Division program contact)
3. Develop an operations and maintenance plan specific to your system (seek technical assistance as needed during this process). (Deliverable: statement asserting completion with copy of the table of contents provided)
4. Develop a 5-year operating plan for the managerial and financial operational needs of your system. (Deliverable: statement asserting completion with copy of table of contents provided)
5. Develop policies and/or ordinances relative to good system management and oversight. (Deliverables: copies of signed and dated ordinances or policies)

6. Conduct a rate study and develop a rate structure that will be responsive to meeting system operational costs. (Deliverables: rate study, tribal ordinance implementing rate structure, report of rate collection)

Contact: Aaron Setran (setran.aaron@epa.gov, 415-972-3457)